

1 Joseph R. Saveri (State Bar No. 130064)  
2 Cadio Zirpoli (State Bar No. 179108)  
3 Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1000  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

9 Matthew Butterick (State Bar No. 250953)  
1920 Hillhurst Avenue, #406  
10 Los Angeles, CA 90027  
Telephone: (323) 968-2632  
11 Facsimile: (415) 395-9940  
mb@buttericklaw.com

12 *Counsel for Individual and Representative  
13 Plaintiffs and the Proposed Class*

14 *[additional counsel on signature page]*

15 **UNITED STATES DISTRICT COURT**

16 **NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISO DIVISION**

17 RICHARD KADREY, SARAH )  
18 SILVERMAN, CHRISTOPHER GOLDEN, )  
TA-NEHISI COATES, JUNOT DIAZ, )  
19 ANDREW SEAN GREER, DAVID HENRY )  
HWANG, MATTHEW KLAM, LAURA )  
LIPPMAN, RACHEL LOUSIE SNYDER, )  
20 JACQUELINE WOODSON, and LYSA )  
TERKEURST, )  
21 Plaintiffs, )  
vs. )  
23 META PLATFORMS, INC., )  
24 Defendant. )  
25 )  
26 )  
27 )  
28 )

6           **WHEREAS**, Plaintiffs filed their Second Consolidated Amended Complaint on August  
7 29, 2024 (“SCAC,” Dkt. 122 (public redacted); Dkt. 121-2 (sealed)); and

8       **WHEREAS**, on September 4, 2024, the parties met and conferred via video conference to  
9 discuss certain proposed corrections to the SCAC, and were able to reach agreement;

10           **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and among the Parties  
11 pursuant to Fed. R. Civ. P. 15(a)(2), subject to the approval of the Court, that:

12       1. Within one (1) Court day of the Court's approval of this stipulation, Plaintiffs will  
13 file a corrected SCAC in the form attached hereto as **EXHIBIT A**.

14 2. The clerk will return the sealed version of the SCAC (Dkt. 121-2) to Plaintiffs, who  
15 will promptly destroy it.

16 3. Meta's obligation to answer the original SCAC (Dkt. 107) is vacated.

17       4. Within five (5) Court days of Plaintiffs' filing the corrected SCAC, Meta will file  
18 its answer and concurrently serve on Plaintiffs a true and correct redline showing all differences  
19 between its answers to the FCAC and corrected SCAC. The answer to the corrected SCAC will  
20 address new allegations in the corrected SCAC but otherwise remain substantively unchanged;

21       5.       There will be no motion practice directed to the corrected SCAC or the answer to  
22 the corrected SCAC pursuant to Fed. R. Civ. P. 12(b)(6), 12(e) or 12(f);

23        6.        This stipulation and the timing of the filing of the corrected SCAC may not be used  
24 by the parties to modify the existing case schedule.

25 7. Except as specifically provided herein, the Parties reserve all rights and defenses.

26 IT IS SO STIPULATED.

27 //  
28 //

1 Dated: September 5, 2024

**CLEARY GOTTLIEB STEEN & HAMILTON LLP**

2 By: /s/ Angela L. Dunning  
3 Angela L. Dunning (212047)  
4 1841 Page Mill Rd., Suite 250  
5 Palo Alto, CA 94304  
Telephone: (650) 815-4100  
adunning@cgsh.com

6 **COOLEY LLP**

7 Bobby A. Ghajar  
1333 2nd St., Suite 400  
8 Santa Monica, CA 90401  
Telephone: (310) 883-6400  
9 bghajar@cooley.com

10 *Attorneys for Defendant Meta Platforms, Inc.*

11 Dated: September 5, 2024

**DiCELLO LEVITT LLP**

12 By: /s/ David A. Straite  
13 David A. Straite (*pro hac vice*)  
14 485 Lexington Ave., Suite 1000  
15 New York, NY 10017  
Telephone: (646) 933-1000  
16 dstraite@dicellosevitt.com

17 Amy Keller (*pro hac vice*)  
18 James A. Ulwick (*pro hac vice*)  
19 Nada Djordjevic (*pro hac vice*)  
20 10 North Dearborn St., Sixth Floor  
21 Chicago, Illinois 60602  
Telephone: (312) 214-7900  
22 akeller@dicellosevitt.com  
julwick@dicellosevitt.com  
ndjordjevic@dicellosevitt.com

**JOSEPH SAVERI LAW FIRM, LLP**

23 Joseph R. Saveri (State Bar No. 130064)  
24 Cadio Zirpoli (State Bar No. 179108)  
25 Christopher K. L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
26 601 California Street, Suite 1000  
San Francisco, California 94108  
Telephone: (415) 500-6800  
27 Facsimile: (415) 395-9940  
28 jsaveri@saverilawfirm.com

1 czirpoli@saverilawfirm.com  
2 cyoung@saverilawfirm.com  
3 hbenon@saverilawfirm.com  
4 acera@saverilawfirm.com

5 Matthew Butterick (State Bar No. 250953)  
6 1920 Hillhurst Avenue, #406  
7 Los Angeles, CA 90027  
8 Telephone: (323)968-2632  
9 Facsimile: (415) 395-9940  
10 mb@buttericklaw.com

11 **CAFFERTY CLOBES MERIWETHER  
& SPRENGEL LLP**

12 Bryan L. Clobes (*pro hac vice*)  
13 Alexander J. Sweatman (*pro hac vice*)  
14 135 South LaSalle Street, Suite 3210  
15 Chicago, IL 60603  
16 Telephone: 312-782-4880  
17 bclobes@caffertyclobes.com  
18 asweatman@caffertyclobes.com

19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 Dated: \_\_\_\_\_, 2024

21 \_\_\_\_\_  
22 Hon. Vince Chhabria  
23  
24  
25  
26  
27  
28

## **CERTIFICATE OF SERVICE**

2 I hereby certify under penalty of perjury that on September 5, 2024, I authorized the  
3 electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will  
4 send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List,  
5 and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service  
6 to the non-CM/ECF participants indicated on the attached Manual Notice List.

/s/ David A. Straite  
David A. Straite